

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHICAGO ORNAMENTAL IRON, INC., et al., )  
)  
Plaintiffs, )  
)  
v. )  
)  
SELECTIVE INSURANCE COMPANY OF )  
AMERICA, a New Jersey corporation, and ) No. 1:25-cv-05131  
ASSUREDPARTNERS OF ILLINOIS, LLC, )  
an Illinois limited liability company, )  
)  
Defendants. )  
)  
)  
)

**DEFENDANT ASSURED PARTNERS OF ILLINOIS, LLC'S  
UNOPPOSED MOTION FOR LEAVE TO FILE ITS FIRST AMENDED ANSWER**

Defendant AssuredPartners of Illinois, LLC (“AssuredPartners”), pursuant to Federal Rule of Civil Procedure 15(a) and for good cause, hereby moves this Court for leave to file a First Amended Answer to Plaintiffs’ Original Complaint (Dkt. 1-1). The proposed First Amended Answer is attached as Exhibit A. In support of this motion, AssuredPartners states:

1. The First Amended Answer, attached hereto as Exhibit A, is amended to conform with N. D. Ill. L.R. 10.1 and to correct an unintentional error in sequence.
2. Counsel for AssuredPartners has contacted counsel for Plaintiffs and counsel for Defendant Selective Insurance Company of America, all of whom consent to this motion.
3. The request to amend is not a product of bad faith or dilatory motive and there has been no undue delay in this request.
4. The motion is submitted in good faith and for good cause and not for purpose of harassment or delay.

5. AssuredPartners' motion will not prejudice any party to this action.

6. By filing this motion, AssuredPartners does not waive any rights or defenses that may be available to it in this court.

WHEREFORE, Defendant AssuredPartners respectfully requests that the Court grant it leave to file its First Amended Answer, as attached hereto as Exhibit A, and for such other and further relief the Court deems just, proper and equitable.

Dated: June 4, 2025

Respectfully submitted,

LATHROP GPM LLP

By: /s/ Arielle B. McPherson

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***Attorneys for Defendant AssuredPartners of  
Illinois, LLC***

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 4, 2025, a true and correct copy of the foregoing AssuredPartners' Unopposed Motion for Leave to File its First Amended Answer was filed via the Court's electronic filing system and served via electronic mail upon the following counsel of record:

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